

United States District Court
Southern District of Texas
Galveston Division

| | | |
|---|---|---------------------------------------|
| Jana Reed, Individually and as Representative | § | |
| of the Estate of Christopher Reed and on | § | |
| behalf of A.R.(a minor); Logan Reed, and Chase | § | |
| Reed | § | |
| <i>Plaintiffs</i> | § | Civil Action No. 3:19-CV-00238 |
| | § | |
| versus | § | Rule 9(H) |
| | § | |
| | § | |
| Maersk Line, Limited | § | |
| <i>In Personam Defendants;</i> | § | |
| M.V. Maersk Idaho | § | |
| <i>In Rem Defendant.</i> | § | |

Plaintiffs' Initial Rule 26 Disclosures

To: Defendant Maersk Line, Limited, and the M.V. Maersk Idaho, by and through their attorney of record, James T. Brown, HFW, 5151 San Felipe, Suite 400, Houston, Texas 77056.

Pursuant to Federal Rule of Civil Procedure 26(a)(1), Plaintiffs now make their initial disclosures.

A. Individuals with Discoverable Information

Plaintiffs:

**Jana Reed, Individually and as Executrix of the Estate of Christopher Reed, and as parent of minor child A.R.
c/o
Paxton N. Crew, Esq.
The Crew Law Firm, P.C.
305 East Main
League City, Texas 77573**

Plaintiff Jana Reed was married to Christopher Reed for twenty-nine years. She has knowledge of the accident in question, the manner and method which Christopher Reed was piloting their 20' recreational boat, the conditions on the afternoon of June 7, 2019 in Galveston Bay, her identification of the M.V. Maersk Idaho, the speed and general direction in which the Reed's boat was headed in Galveston Bay on that date, the appurtenances on board the Reed's boat, the size of the M.V. Maersk Idaho's wake and whether it could be clearly observed from her vantage point aboard the Reed's

vessel. She also has knowledge of the accident in question, and from her perspective, how hit occurred, as stated in her original complaint. She has knowledge of her attempts to save her husband from drowning and her witnessing him drown. She has knowledge of the attempts to rescue/recover him following the accident and the damage caused to her by having witnessed this and to her family by his loss—and therefore has knowledge of the damages she has sustained and her minor child has sustained by his loss. Ms. Reed is also expected to offer testimony and to assist her minor child in providing testimony regarding the loss of Chris and what impact that will have on their youngest child (A.R.).

Logan Reed
c/o
Paxton N. Crew, Esq.
The Crew Law Firm, P.C.
305 East Main
League City, Texas 77573

Ms. Logan Reed is Christopher and Jana Reed's adult daughter. She has knowledge of her damages in this case, including the loss of her father in her life, and how that has affected her.

Chase Reed
c/o
Paxton N. Crew, Esq.
The Crew Law Firm, P.C.
305 East Main
League City, Texas 77573

Mr. Chase Reed is Christopher and Jana Reed's son. He has knowledge of his damages in this case, including the loss of his father in his life, and how that has affected him.

Minor Child (A.R.)
c/o
Paxton N. Crew, Esq.
The Crew Law Firm, P.C.
305 East Main
League City, Texas 77573

(A.R.) is Christopher and Jana Reed's youngest daughter. She has knowledge of her damages in this case, including the loss of her father in her life, and how that has affected her. She is expected to testify with the assistance of her mother, Jana Reed.

Maersk Witnesses:

Corporate Representatives of Maersk Line, Limited
Master of the *M.V. Maersk Idaho*
Lookout of the *M.V. Maersk Idaho*

**Crewmembers of the *M.V. Maersk Idaho*
c/o James T. Brown
HFW
5151 San Felipe, Suite 400
Houston, Texas 77056**

The witnesses above have information and knowledge related to Plaintiffs' claims and the Defendants' defenses, notably: the wake characteristics of the *M.V. Maersk Idaho* in a narrow channel, such as the Houston Ship Channel; the impact of speed on a vessel's wake; the under keel clearance requirements for a vessel such as the *M.V. Maersk Idaho* transiting the Houston Ship Channel; the safe speed for the *M.V. Maersk Idaho* to prevent wake damage to other vessels in Galveston Bay; the standing orders of the *M.V. Maersk Idaho*; the safety policies in place to avoid or limit wake damage to other vessels caused by the *M.V. Maersk Idaho*; the dimensions, draft and trim of the *M.V. Maersk Idaho* on June 7, 2019; the bridge team communications and engine room orders carried out aboard the *M.V. Maersk Idaho* on June 7, 2019; and other relevant information that may be discovered as this case progresses.

B. Relevant Documents, Electronically Stored Information & Tangible Things

Copies of all documents in Plaintiff's possession relating to this claim and the dispute have been provided to opposing counsel electronically.

C. Information Related to Calculation of Damages

Plaintiffs will provide expert reports pursuant to the Court's case management plan regarding economic damages.

/s/ Paxton N. Crew
Paxton N. Crew
ATTORNEY-IN-CHARGE FOR
PLAINTIFFS
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And

/s/ John W. Stevenson, Jr.
JOHN W. STEVENSON, JR.
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Certificate of Service

On October 28, 2019 I certify that a copy of Plaintiff's Rule 26 Disclosures was submitted to Defendants (without attachments) by the Southern District of Texas Electronic Case Filing System and was served by electronic mail before 5:00 pm with enclosures, on the following attorney for Defendants:

James T. Brown
HFW
5151 San Felipe, Suite 400
Houston, Texas 77056

/s/ Paxton N. Crew
Paxton N. Crew